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**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

MICHAEL A. GARCIA,  
Plaintiff,  
v.

CAROLYN W. COLVIN,  
Acting Commissioner of Social Security,  
Defendant.

)  
) Case No. 2:15-CV-00200-MMD-CWH  
)

) **UNOPPOSED MOTION TO EXTEND TIME**  
) **FOR DEFENDANT TO FILE HER RESPONSE**  
) **TO PLAINTIFF'S MOTION FOR REVERSAL**  
) **AND/OR REMAND (FIRST REQUEST)**  
)  
)  
)

COMES NOW Defendant Carolyn W. Colvin, Acting Commissioner of Social Security (Defendant), by and through her counsel, Daniel G. Bogden, United States Attorney, and Blaine T. Welsh, Assistant United States Attorney, to request that this Court extend the time to respond to Plaintiff's Motion for Reversal and/or Remand by 30 days, from July 6, 2015 to August 5, 2015. All further deadlines will be extended accordingly. Counsel for Defendant conferred with Plaintiff's counsel, who has no opposition to this motion, on July 6, 2015.

This is Defendant's first request for an extension. The additional time is necessary due to the exceptionally heavy workload of Defendant's attorney assigned to this case. In particular, Defendant's

1 attorney has five Federal District Court briefs due the same week that the instant brief is due, as well  
2 as court-ordered deadlines in an employment law matter in litigation before the Equal Employment  
3 Opportunity Commission. The additional time will allow Defendant to address the issues Plaintiff has  
4 raised in her Motion for Reversal and/or Remand.

5 Respectfully submitted this 6th day of July 2015.

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7 DANIEL G. BOGDEN  
8 United States Attorney

9 /s/ Jennifer A. Kenney  
10 JENNIFER A. KENNEY  
Special Assistant United States Attorney

11 OF COUNSEL:  
12 DONNA L. CALVERT  
Regional Chief Counsel, Region IX  
13 Social Security Administration  
14

15 IT IS SO ORDERED:

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17 \_\_\_\_\_  
18 UNITED STATES DISTRICT JUDGE  
UNITED STATES MAGISTRATE JUDGE

19 DATED: July 7, 2015  
20 \_\_\_\_\_  
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**CERTIFICATE OF SERVICE**

I, Jennifer A. Kenney, certify that the following individual was served with a copy of the foregoing **UNOPPOSED MOTION TO EXTEND TIME FOR DEFENDANT TO FILE HER RESPONSE TO PLAINTIFF'S MOTION FOR REVERSAL AND/OR REMAND (FIRST REQUEST)** on the date and via the method of service identified below:

**CM/ECF:**

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Dated this 6th day of July 2015.

/s/ Jennifer A. Kenney  
JENNIFER A. KENNEY  
Special Assistant United States Attorney